



400 Town Line Road, Ste. 170  
Hauppauge, NY 11788  
631.265.7200  
facsimile 631.265.7578

Charles C. Russo  
Terry J. Karl (R)  
Kurt P. Widmaier  
Richard T. Cordano  
Joseph L. Indusi



Colleen F. Dowd  
Lauren E. Murray  
Doris B. Bilotti  
Christopher Gerace

*Medicaid Consultant*  
Margaret Wisz, LMSW

*Of Counsel*  
Joseph C. Tonetti, P.C.  
Kim Brennan Joyce, P.C.

*By appointment only:*  
186 Joralemon Street  
Suite 1202  
Brooklyn, NY 11201



1103 Stewart Avenue  
Suite 200  
Garden City, NY 11530



402 Main Street  
Pt. Jefferson, NY 11777



7 Bayview Avenue  
Northport, NY 11768

May 26, 2022

Hon. Ann M. Donnelly  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722  
via ECF

Re: All Systems Maintenance, Inc., et al. v. Giordano, et al.  
Docket No. 21-cv-06412

Your Honor:

I represent the Plaintiffs in the above referenced matter. I write to advise the Court that the parties have reached an impasse and are unable to agree on settlement. In light of this breakdown, I respectfully request a three-week adjournment to discuss with my clients their options moving forward, including whether to engage in motion practice or to remove this matter to state court.

Thank you for your consideration.

Respectfully submitted,

Russo Karl Widmaier & Cordano, PLLC

/s/ Christopher Gerace, Esq.